APPENDIX A

The Women's Legal Defense Fund (WLDF) is a non-profit national advocacy organization founded in 1971 to advance the rights of women in the areas of work and family. WLDF represents women and men challenging barriers to sexual equality, particularly those in employment. It does so through litigation of significant cases, public education, and lobbying for improvements in the equal employment opportunity laws and their enforcement.

The American Federation of Government Employees, AFL-CIO (AFGE), represents more than 700,000 federal employees in sixty-five agencies of the federal government and the District of Columbia. As the largest union of public sector employees working for the federal government, where some 20,000 complaints of discrimination are filed each year, AFGE is concerned that First Amendment protections reach statements produced in internal agency investigations.

The American Federation of State, County, and Municipal Employees, AFL-CIO (AFSCME) is a labor organization representing approximately 1.5 million working men and women throughout the United States, Puerto Rico, and Panama. AFSCME is the largest union of public employee and health care workers in the country. Over one million of these workers are employed by state and local governments, with several thousand of these government employees working in the state of Georgia. Throughout the country, AFSCME develops, initiates, assists, and defends litigation in state and federal courts as well as before administrative agencies addressing questions of labor relations, civil rights, and due process under the law. AFSCME labors to protect the rights of workers both on and off the job. AFSCME is

committed to ensure equality of rights for all workers both on and off the job. AFSCME is committed to ensure equality of rights for all workers and to oppose discrimination against workers based on race, color, creed, national origin, age, political belief, religion, gender, disability, or sexual orientation.

The American Federation of Teachers, AFL-CIO (AFT), is a national labor union affiliated with the AFL-CIO. The AFT represents over 800,000 members who work in public elementary and secondary schools, community colleges and universities, state government, and health care. The majority of AFT members work as teachers and teaching assistants in public elementary and secondary schools.

The Center for Women Policy Studies was founded in 1972 as the first national policy research and advocacy institute focused exclusively on issues of social and economic justice for women. The Center conducts research and advocacy programs on sexual harassment and violence against women, work/family and "diversity" policies of employers, education, and other relevant issues.

The Coalition of Labor Union Women (CLUW) is America's only national organization for union women. Not a union itself, CLUW strives to make organized labor — and the public in general — more sensitive to the needs of working women and their families. CLUW has 75 chapters nationwide and over 20,000 members representing more than 60 unions. Since 1974, CLUW has fought for decent wages and working conditions, and a stronger voice for workers in society.

Equal Rights Advocates, Inc. (ERA) is a San Francisco-based public interest legal and educational corporation dedicated to working through the legal system to secure equality for women. ERA has a twenty year history of representing the interests of working women in the courts, legislatures, and public education campaigns. Since its early days, ERA has worked to end sexual harassment both through litigation and public policy initiatives. ERA represented plaintiff in the first case in the Ninth Circuit to find sexual harassment a violation of Title VII. (*Miller* v. *Bank* of America, 600 F.2d 211 (9th Cir. 1979).) In addition, ERA advises hundreds of women each year through its advise and counseling "hot line" regarding their legal right to be free from this invidious form of discrimination and provides technical assistance to scores of attorneys each year who are representing clients with sexual harassment claims. Our experience has shown that it is vital that women be encouraged to speak out about sexual harassment in order to eradicate it.

Mexican American Women's National Association (MANA), is a national Latina Organization founded by Mexican American Women in 1974. *Morgan* v. *Ford* provides an opportunity for the court to provide clarity on an important issue regarding First Amendment issues in cases of sexual harassment. MANA's interest in the matter is to ensure that all individuals will be free of retaliation in coming forth to testify in such cases — that are under reported in our society.

The National Council of Jewish Women (NCJW), Inc. is a volunteer organization, inspired by Jewish values, that works through a program of research, education, advocacy and community service to improve the quality of life for

women, children and families and strives to ensure individual rights and freedoms for all. Founded in 1893, the National Council of Jewish Women has 100,000 members in over 500 communities around the country. Based on NCJW's National Resolutions that include working for "employment policies which safeguard the dignity, rights, benefits, health and safety of all workers," we join this brief in support of a petition for certiorari.

The National Education Association (NEA) is a nation-wide labor organization with a current membership of more than 2 million persons, the vast majority of whom are employed by public school districts, colleges and universities. One of the principal purposes of NEA is to safeguard the constitutional rights of its members in matters relating to their employment.

The National Organization for Women (NOW) is the largest feminist organization in the United States, with a membership of over 225,000 women and men in more than 750 chapters throughout the country. Since its founding in 1966, a major goal of NOW has been the eradication of sex discrimination in employment, and the elimination of barriers that deny women economic opportunities and the ability to become economically seif-sufficient. NOW believes that economic equality in the paid workforce is fundamental to women's ability to achieve equality in other aspects of society. In furthering its commitment to that goal, NOW has participated in numerous cases and commented on proposed legislation and regulations to secure full enforcement of laws prohibiting employment discrimination against women.

The National Treasury Employees Union (NTEU) is a federal sector labor organization that represents approximately

The National Treasury Employees Union (NTEU) is a federal sector labor organization that represents approximately 150,000 federal employees nationwide. In addition to serving as their collective bargaining representative, NTEU frequently represents employees at the workplace and in administrative and judicial proceedings seeking to vindicate their rights under numerous anti-discrimination laws, including those that prohibit sexual harassment. NTEU, accordingly, has a strong interest in promoting the enforcement of those laws and protecting the rights of public employees under the First Amendment to speak freely on matters of public concern.

NOW Legal Defense and Education Fund ("NOW LDEF") is a leading national non-profit civil rights organization that performs a broad range of legal and educational services in support of woman's efforts to eliminate sex-based discrimination and secure equal rights. NOW LDEF was founded in 1970 by leaders of the National Organization for Women. A major goal of NOW LDEF is the elimination of barriers that deny women economic opportunities, such as sexual harassment. In furtherance of that goal, NOW LDEF litigates cases to secure full enforcement of laws prohibiting sexual harassment, including *Robinson* v. *Jacksonville Shipyards, Inc.*, 760 S. Supp. 1486 (M.D. Fla. 1991), *appeal pending* (11th Cir. argued Dec. 2, 1992), and *Townsend* v. *Indiana University*, No. 92-2869 (7th Cir. argued April 6, 1993).

The Northwest Women's Law Center (NWLC) is a non-profit public interest organization dedicated to protecting the legal rights of all women through litigation, education, legislation and the provision of legal information and referral services. Since its founding 1978, the NWLC has been devoted to eradicating sex discrimination in the workplace and has focused particular attention on the problem of sexual

harassment. The NWLC believes that sexual harassment in the workplace is an issue of significant public concern and has participated as counsel and as *amicus curiae* in cases throughout the country in efforts to ensure the availability of legal remedies for victims of sexual harassment. The NWLC is also active in efforts to educate employers and the general public about the widespread problem of sexual harassment in the workplace.

Wider Opportunities for Women (WOW) is a non-profit women's employment organization committed to working nationally and locally in its home community of Washington, D.C. to achieve economic independence and equality of opportunity for women and girls. WOW helps women learn to earn, with programs stressing literacy, technical, and non-traditional skills, and career development. Sexual harassment remains one of several barriers that women encounter in the workplace. In order for WOW to achieve its goals, working environments must be made free of sexual harassment and all other forms of discrimination.

Women Employed is a national membership association of 2000 working women based in Chicago. Since 1973, the organization has assisted thousands of working women with sex discrimination problems, analyzed equal opportunity policies, monitored the performance of equal opportunity enforcement agencies, and developed proposals for improving enforcement efforts. Women Employed strongly believes that sexual harassment in the workplace is one of the chief barriers to achieving equal opportunity and economic equity for working women.

The Women's Law Project (WLP) is a non-profit, feminist legal advocacy organization located in Philadelphia. Founded

in 1974, WLP works to abolish discrimination and injustice and to advance the legal and economic status of women and their families through litigation, public education, and individual counseling. During the past twenty years, WLP's activities have included extensive work in the area of sex discrimination in employment. WLP has a strong interest in the eradication of sexual harassment from the workplace and the availability of strong and effective legal remedies for harassment and other forms of sex discrimination. WLP believes that the decision below will deter victims of sexual harassment from reporting and seeking redress for harassment in the workplace.

The Women's Policy Group (WPG) is a non-profit corporation of individuals working to the personal, family and work lives of Georgia's women and girls. The WPG advocates equal rights for all women by enforcing anti-discrimination laws and by promulgating new remedies that would provide legal bases to end the widespread discrimination confronting women. The WPG advocates on these issues in various forums: legislative, administrative and judicial.

Women Work! The National Network for Women's Employment is a membership organization, rooted in the Displaced Homemakers Movement, dedicated to empowering women from diverse backgrounds and assisting them to achieve economic self-sufficiency through job readiness, education, training, and/or employment. In addition to individuals throughout the country, Network members include more than 1,000 education, training, and employment programs. The Network is committed to on-going, comprehensive public education to build awareness of the needs of and support for mid-life and older displaced homemakers and

other women entering, re-entering, and training for the workforce. The Network collects data, disseminates information, provides training and technical assistance and acts as a communication link to programs, agencies and educational institutions. The Network affects public policy by working with lawmakers, business leaders and labor to create and strengthen programs and policies for women.